

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)
OF AMERICA)
Plaintiff)
)
)
V.)
)
MATTHEW MARSH,)
Defendant,)
_____)

CRIMINAL NO. 4:05-cr-40025-FDS

DEFENDANT'S MOTION TO RETAIN EXPERT WITNESS

Defendant Matthew Marsh, pursuant to 18 USC 3006A(e)(1), moves the court to permit him to retain the services of an expert, Dr. Ronald Ebert, 222 Forbes Road, Braintree, MA 02184, in connection with a psychological examination. In support thereof, the defendant submits:

1. The defendant has been declared indigent by the court and is represented by court-appointed counsel.
2. As a result of the presentence report it is clear that the defendant suffers from mental disease and defect and bipolar disorder.
3. It is important that the defendant be examined for purposes of sentencing and possible downward departures.
4. The defendant seeks to engage the services of Dr. Ronald Ebert, of Braintree, MA, a highly qualified and experienced psychologist who has participated in numerous criminal evaluations.

5. Dr. Ebert's services are to be charged at \$250.00 per hour, and a total expense for his services for the engagement will not exceed \$3,500.

Therefore, pursuant to 18 USC 3006A(e)(1), the defendant requests the court to permit defendant's counsel to engage Dr. Ronald Ebert for the services contemplated hereby.

/s/ Alan J. Black
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the Assistant United States Attorney, Lisa Asiaf on this 18th day of January 2007.

/s/ Alan J. Black